

Robert T. Mills (Arizona Bar #018853)  
 Sean A. Woods (Arizona Bar #028930)  
**MILLS + WOODS LAW, PLLC**  
 5055 North 12th Street, Suite 101  
 Phoenix, Arizona 85014  
 Telephone 480.999.4556  
[docket@millsandwoods.com](mailto:docket@millsandwoods.com)  
[swoods@millsandwoods.com](mailto:swoods@millsandwoods.com)  
[rmills@millsandwoods.com](mailto:rmills@millsandwoods.com)  
*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

Kashane Kirk, as Personal Representative  
 and on behalf of the Estate of Leontae  
 Kirk; Sharon Roberts, individually;  
 Brittanie Turner, on behalf of and as legal  
 guardian and parent of her minor child,  
 MC,

Plaintiffs,

vs.

City of Phoenix, a governmental entity;  
 Michael Sullivan, Chief of the Phoenix  
 Police Department; Autumn Ladines and  
 John Doe Ladines, husband and wife;  
 Officer Antonio Garza and Jane Doe  
 Garza, husband and wife; Sergeant Eric  
 Roy and Jane Doe Roy, husband and wife;  
 Jaclyn Ravelo and John Doe Ravelo,  
 husband and wife; Steven Ramirez and  
 Jane Doe Ramirez, husband and wife, and;  
 Jonathan Howard and Jane Doe Howard,  
 husband and wife,

Defendants.

No.: CV-23-00836-PHX-MTL (CDB)

**STIPULATION TO EXTEND  
 DEADLINES**

**(FOURTH REQUEST)**

(Assigned to the Honorable Michael T.  
 Liburdi and referred to the Honorable  
 Camille D. Bibles)

Through counsel undersigned, the parties hereby stipulate and agree to an extension  
 of existing deadlines in this action by approximately sixty days each. This Stipulation is  
 being brought in good faith. Recently, on May 12, 2025 a new statutory beneficiary of  
 Leontae Kirk was discovered when a paternity test was presented to Plaintiffs. Counsel for

1 both sides had been entertaining settlement discussions and had a mediation scheduled for  
2 June 10, 2025. Counsel had discussions regarding extensions of deadlines due to the  
3 discovery of the new statutory beneficiary and agreed to extend expert deadlines because  
4 of this and the pending mediation. Counsel for Plaintiffs did submit expert reports as of the  
5 deadline of May 16, 2025, but because of the discovery of the new statutory beneficiary,  
6 the expert reports likely need to be modified. Moreover, the court has also yet to rule on  
7 the pending renewed motion to dismiss, which may also still impact discovery in addition  
8 to the new beneficiary, and all counsel and some clients have prebooked summer travel  
9 that will cause completion of discovery to take a little longer.

12 Therefore, the parties stipulate to extend the deadlines as follows:

13 1. The last day for Plaintiffs to provide full and complete expert disclosure,  
14 from May 16, 2025 to **July 16, 2025**;

16 2. The last day to serve final supplemental disclosure, from May 19, 2025 to  
17 **July 18, 2025**;

18 3. The last day for the parties to meet in person and engage in good faith  
19 settlement talks, from May 30, 2025 to **July 30, 2025**;

21 4. The last day for Defendants to provide full and complete expert disclosure,  
22 from June 17, 2025 to **August 18, 2025**;

23 5. The last day to provide rebuttal expert disclosures, from July 29, 2025 to  
24 **September 29, 2025**;

26 6. The last day for fact discovery, including disclosure of ESI and conclusion  
27 of fact/lay depositions, from August 25, 2025 to **October 27, 2025**;



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Phoenix, AZ 85014  
480.999.4556

**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Sarah L. Barnes

[slb@bowwlaw.com](mailto:slb@bowwlaw.com)

Jeremiah M. Sullivan

[jms@bowwlaw.com](mailto:jms@bowwlaw.com)

**BROENING OBERG WOODS & WILSON, P.C.**

[kel@bowwlaw.com](mailto:kel@bowwlaw.com)

[szb@bowwlaw.com](mailto:szb@bowwlaw.com)

[rla@bowwlaw.com](mailto:rla@bowwlaw.com)

2800 N Central, 16th Floor

Phoenix, AZ 85004

*Attorney for Defendants City of Phoenix, Sullivan,*

*Ladines, Garza, Roy, Makic, Ravelo, Ramirez,*

*Howard, Traylor, and Reddy*

*/s/ Ben Dangerfield*